

RETURN DATE: JULY 19, 2016	: SUPERIOR COURT
	:
DANIEL GREER	:
	: J.D. OF NEW HAVEN
	:
v.	: AT NEW HAVEN
	:
LAWRENCE DRESSLER	: JUNE 20, 2016

### COMPLAINT

#### FIRST COUNT: (DEFAMATION)

1. At all times mentioned herein, the Plaintiff, Daniel Greer, was a resident of the City of New Haven, Connecticut.
2. At all times mentioned herein, the defendant, Lawrence Dressler, was a resident of New Haven, Connecticut.
3. At all relevant times mentioned herein, the defendant, Lawrence Dressler, published information on the internet under the name of Larry Noodles.
4. On or about April 14, 2016, the defendant falsely reported that a claim of sexual molestation against Daniel Greer recently settled in the millions of dollars and described said settlement as "hush money."
5. On or about April 18, 2016, Daniel Greer demanded a retraction of this false and defamatory statement made about the plaintiff.

6. The defendant refused to retract this statement.
7. This allegation made by the defendant, Lawrence Dressler, was false and the defendant made the allegation knowing it were false and made the allegation with the intention of causing harm and damage to the plaintiff's reputation as well as his career.
8. The defendant, Lawrence Dressler, knew or should have known that the statement that Daniel Greer paid millions of dollars in hush money to settle a sexual molestation claim was damaging and false.
9. As a result of the defendant's actions in making this false statement, the plaintiff's professional reputation was harmed.
10. As a result of the defendant's actions in making the false statements, the plaintiff suffered emotional pain and suffering.

**SECOND COUNT: (DEFAMATION WITH MALICE)**

- 1-10. Paragraph 1 through 10 of the First Count are incorporated by reference herein as Paragraph 1-10 of this the Second Count.
11. The false allegation made by the defendant, Lawrence Dressler, was made with actual malice and/or reckless disregard of the truth.

12. The false allegation made by the defendant is libelous per se as it alleges the commission of a crime involving moral turpitude.
13. The false allegation made by the defendant. Lawrence Dressler is further slanderous per se in that a said allegation attacks the plaintiff's professional character as well as his standing and reputation in the community.
14. The plaintiff is charging general damages for the harm caused to his reputation and for the humiliation and mental suffering the libel and slanderous comments have and are continuing to cause him.

WHEREFORE, the Plaintiff claims:

1. Monetary damages; and

2. Such other relief as in equity may appertain.

THE PLAINTIFF

BY 

William J. Ward, his Attorney  
336 Torrington Road  
P.O. Box 430  
Litchfield, Connecticut 06759  
(860)567-2210  
Fax: (860)567-2218  
Juris No: 405627

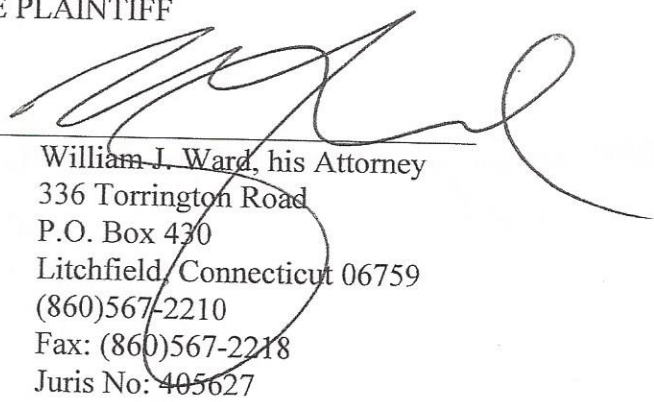
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**STATEMENT RE: AMOUNT IN DEMAND**

The Plaintiff in the above captioned matter represents that the amount, legal interest or property in demand is greater than Fifteen Thousand (\$15,000.00) Dollars, exclusive of interest and costs.

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